

Oversight of Orange County Law Enforcement Agencies *Resolving a Dichotomy!*

*“As a Law Enforcement Officer....
I recognize the badge of my office as a symbol of public faith,
and I accept it as a public trust to be held
so long as I am true to the ethics of the police service.”*
Law Enforcement Code of Ethics

1. Summary

Why wait until there is a highly publicized and criticized officer-involved event that results in the hasty, emotional creation of a citizen oversight commission? Although Orange County history may not demonstrate an overwhelming need, long term interests of residents may best be served by independent monitoring prior to such an event.

Other than the Orange County grand jury, there is no formal citizen oversight of county and city law enforcement agencies (LEAs). Although there is no statutory authority that requires a grand jury to accept resident’s complaints, the practice of Orange County grand juries has been to do so. The California Department of Justice also allows grand juries to act in such a capacity as it relates to complaints regarding LEAs. The complaint form is available to residents online at www.ocgrandjury.org; however, not all complaints received are acted upon by grand juries.

Advocates believe that citizen oversight improves visibility of and accountability by LEAs. Orange County cities and LEAs consider current oversight to be adequate and citizen oversight groups redundant, (1) because LEAs are effectively enforcing the law and providing public safety while adhering to policies and procedures and (2) because of the many existing criminal justice system oversight agencies, community outreach programs, evolving policies and procedures, internal complaint procedures, and the election process. In addressing this dichotomy between advocacy groups and LEAs, the 2005-2006 Orange County Grand Jury found that:

- 1.1** Current practices for improving county and city LEAs’ policies and procedures may not ensure that these policies and procedures are evolving to a level of best practices.
- 1.2** Past independent reviews of LEAs’ practices have been unique, limited reviews rather than periodic reviews of policies, procedures and compliance.

Acronyms

BOS	Board of Supervisors
CALEA	Commission on Accreditation for Law Enforcement Agencies
LEA	Law Enforcement Agency (Agencies)
OCSD	Orange County Sheriff’s Department
POST	California Peace Officers’ Standards and Training

- 1.3 Using public/private sector management techniques such as best practices, self-assessment, and independent audits would improve LEA monitoring (as opposed to citizen oversight boards which are subject to political pressure).
- 1.4 The grand jury faces significant limitations when considering and responding to citizen complaints about LEAs, including time constraints, lack of law enforcement and/or legal experience, and response contents.

2. Introduction and Purpose of the Study

Residents have the right to reasonable treatment at the hands of law enforcement, acknowledging that there are occasions where extreme measures by officers are warranted. Recent exposure of the Grand Jury to individual concerns of alleged abuse at the hands of Orange County LEAs demonstrated an absence of a formal citizen review of such events.

The purpose of this study is to determine if there is a need for citizen oversight to improve community visibility of LEAs, and to explore alternative oversight mechanisms.

3. Method of Study

To conduct this study, the Grand Jury:

- Interviewed members of LEAs, other Orange County residents, and oversight agencies outside of Orange County
- Reviewed current studies and documents regarding oversight mechanisms and laws
- Surveyed LEAs regarding policies and procedures, complaint processes, and existing oversight mechanisms
- Participated in a “call-out”, a “ride-along”, and tours, including Coroner Reviews, an autopsy, forensics, pathology, jails and other LEA operations

4. Background

In general, LEAs establish a system of planned actions (control system) that are built into processes/procedures to provide reasonable assurance of achieving effectiveness and efficiency of operations and compliance with applicable laws and regulations.

Monitoring is the external oversight of the control system by management or other parties outside a process. Ongoing monitoring may involve analysis/reviews by other employees, *e.g.*, many LEAs include personnel assigned to risk management and internal affairs units. Monitoring may also be independent evaluations conducted by citizen oversight organizations external to a LEA, *e.g.*, police commissions and grand juries.

The International Association of Chiefs of Police publication “Police Accountability and Citizen Review-A Leadership Opportunity for Police Chiefs” outlines LEA leader actions to understand and help implement oversight mechanisms. According to this report:

“Public concerns about racial profiling, excessive use of force, deliberate violations of sanctioned evidence handling procedures and corruption create mistrust. When events such as these take center stage, communities begin to question the integrity of their police agencies.”

Although recognizing that LEA leaders must take a proactive approach, most LEAs in Orange County do not have community-recognized, independent citizen oversight mechanisms.

4.1 Internal Monitoring

Several oversight process options exist internally within California LEAs to assure that policies and procedures are appropriate, that training is adequate, and that officers meet standards:

Investigations: Detectives conduct an investigation of an officer-involved event or complaint to determine criminality. All LEAs in Orange County have adopted the Operational and Procedural Protocol “Establish Protocol for Officer Involved Shootings”, established in 1990 by the Orange County Chiefs’ of Police and Sheriff’s Association. Based on this protocol, an LEA requests that the District Attorney’s Bureau of Investigation or another LEA conduct the investigation.

Internal Affairs: An internal affairs unit conducts separate administrative investigations into officer-involved events that allege misconduct on the part of an officer. LEA leaders review these investigations and take applicable actions.

Professional Standards: A professional standards unit conducts independent investigations to determine if there are issues with policies, procedures, and training. Recommendations to improve practices are submitted to the LEA leader for subsequent action.

Complaints – Internal and Community: Internal complaints are generated from within a department by employees. Complaints are also accepted from the community. These complaints are investigated and the results are communicated to the complainant. As required by California Penal Code, every LEA has a complaint procedure and annually reports statistics to the California Department of Justice.

4.2 Citizen Monitoring

To better understand monitoring through the use of citizen oversight, the following quote is taken from the “Review of National Police Oversight Models for The Eugene Police Commission”:

“...the key attributes of those providing oversight must be credibility, integrity, fairness, pragmatism, openness, and good judgment. Much like judges in a court of law, those providing police oversight must maintain a reputation for scrupulous fairness and reasoned judgment. Their decisions must persuade persons with very different perspectives. What the formulating and appointing authorities should strive to achieve is that at the end of the day both the community firebrand and the staunchest member of the police union will be able to agree, even if they cannot agree on anything else, that the decisions of the oversight body are fair and made in good faith.”

Citizen monitoring takes on many forms which reflect the needs and concerns of the individual communities. Several reports provide the following models of oversight:

Review: A citizen oversight organization receives complaints from the community and reviews the completed investigation file. This review results in a recommendation to the LEA leader that the complaint is sustained, not sustained, or that further investigation is required. A grand jury is an example of such a review organization.

Investigative: A citizen oversight organization has the power to conduct its own investigation of an event or complaint to reduce conflicts of interest that may occur during an internal investigation by an LEA. Findings are directed to the LEA leader.

Independent Consultant: An independent consultant or special counsel evaluates an LEA in its entirety to make judgments over time regarding how well the department minimizes the risk of peace officer misconduct, identifies and corrects patterns and practices of unconstitutional and illegal behavior, and finds solutions to systemic failures. It is performance-based, examining how individual officers perform, how supervisors and executives respond, and how the LEA manages risk.

4.2.1 National Association for Civilian Oversight of Law Enforcement Agencies

This is an association of civilian oversight professionals which provides resources for creation and maintenance of oversight. The objectives are to encourage change and improve relationships between residents and police, shape “accountability dialogue”, and model the behavior desired in LEAs. According to this national association:

“...the relationship between police and community - particularly the minority community - continues to be one of the most critical social issues facing this country. The number of civilian oversight agencies in the U.S. has significantly increased. Of the nation’s 100 largest cities, 71 have citizen review mechanisms.

“It is recognized that the majority of law enforcement officers strive, often under dangerous and demanding circumstances, to carry out their duties in a restrained, lawful and professional manner. ...Citizens want to feel secure that police officers are in the community to serve and protect all citizens of that community. We believe that citizens have a right to assurance that adequate mechanisms are available to review and investigate questionable or unacceptable actions of law enforcement officers.”

4.2.2 Grand Jury Oversight

By California law, grand juries have three basic functions:

- To weigh criminal charges and determine whether indictments should be returned
- To weigh allegations of misconduct against public officials and determine whether to present formal accusations requesting their removal from office
- To act as the public's watchdog by investigating and reporting upon the affairs of local government

The grand jury, as the public's watchdog, may review the operations of the Orange County Sheriff's Department (OCSD), Probation Department, District Attorney, Public Defender, and municipal police departments. In addition, California Department of Justice policy states that:

"...local government will be primarily responsible for citizen complaints against law enforcement agencies or employees of law enforcement agencies, and that appropriate local resources (*e.g.* sheriff or police department, district attorney, citizens' review commission and/or *grand jury in the area of jurisdiction*) be utilized for resolution of such complaints prior to a request for intervention by the Attorney General." (Emphasis added.)

The grand jury also provides oversight of LEAs by virtue of a resident's complaint procedure. Although the grand jury is not required to accept complaints, it does so as a practice. In response to these complaints, the grand jury may not act as an ombudsman for individuals but may investigate such complaints. (The complaint form is available online at www.ocgrandjury.org.)

The grand jury's only method of communication authorized by statute is via a published report after approval of release by the Superior Court. Such reports are released only when a grand jury makes recommendations to governmental agencies and do not function as a direct response to complainants.

Another hindrance to the grand jury is the limited time to review complaints. The Superior Court has the authority to order the impaneling after consultation with the grand jury foreperson, acting on behalf of the panel, the District Attorney, and the Presiding Judge of the Superior Court. Forty-eight percent (48%) of California counties have impaneled a second grand jury in the last four years.

4.3 Professional Monitoring

Law enforcement associations and private, independent consultants offer monitoring services to LEAs.

The International Association of Chiefs of Police offers

“...comprehensive surveys of the management and operations of police agencies. The surveys aim to determine the degree to which a department is properly accountable, is operating cost-effectively, complies with professional police standards, and satisfies the crime control and service requirements of the citizens it serves.”

The Los Angeles County Board of Supervisors employs a Special Counsel who has wide powers of investigation to provide an independent review of the Los Angeles County Sheriff’s Department. Semi-annual reports provide visibility and accountability of department management with the goal to evolve policies and procedures to a level of best practices. The experience and reputation of the Special Counsel in Los Angeles County includes participation in the Christopher Commission investigation of the Los Angeles Police Department and the Kolt’s Report which established the monitoring of the Los Angeles County Sheriff’s Department.

Many independent consultants provide a plethora of services available to LEAs for monitoring including: processes review, data analysis, risk management, management strategies, discover patterns of conduct, staffing, training, etc.

Some Orange County LEAs currently utilize, or have utilized, independent consultants to study specific functions and/or processes and one LEA utilizes a private company to continuously update policy.

4.4 Law Enforcement Standards

Most Orange County LEAs are members of and certified by the Commission on Peace Officers’ Standards and Training (POST). Established by the California Legislature, POST provides the minimum standards for selection and training for law enforcement officers. The LEAs must provide personnel information to POST about officers, including dates of hire, promotions, disciplinary actions, assignments and training and POST conducts a compliance review of this data.

Two LEAs are accredited by the Commission on Accreditation for Law Enforcement Agencies (CALEA), an independent accrediting authority established in 1979 by four major law enforcement membership associations: International Association of Chiefs of Police, National Organization of Black Law Enforcement Agencies, National Sheriffs’ Association, and Police Executive Research Forum. Community policing is an element of the standards and according to the CALEA, by involving the community and meeting these standards, the number and severity of events have been shown to decrease significantly.

4.5 Southern California Oversight of LEAs

Major Southern California counties and cities have some form of LEA citizen oversight as a consequence of highly criticized events. The following table shows the type of oversight and reporting relationship:

Oversight of Orange County Law Enforcement Agencies

Law Enforcement Agency	Type of Oversight	Reporting Relationship
City of Los Angeles	<ul style="list-style-type: none"> Investigative 	<ul style="list-style-type: none"> Reports to Police Commission Board (appointed by the Mayor)
County of Los Angeles	<ul style="list-style-type: none"> Review (citizen) Internal review Independent Consultant 	<ul style="list-style-type: none"> LA Sheriff's Department LA Sheriff's Department Contracted by BOS
City of San Diego	<ul style="list-style-type: none"> Review 	<ul style="list-style-type: none"> Appointed by Mayor.
County of San Diego	<ul style="list-style-type: none"> Investigative 	<ul style="list-style-type: none"> Appointed by BOS
City of Long Beach	<ul style="list-style-type: none"> Review and Investigative 	<ul style="list-style-type: none"> Appointed by Mayor/City Council

4.6 Public/Private Sector Practices

Two management techniques used throughout the public and private sectors are applicable to law enforcement agencies:

Self-Assessment: Self-assessment provides a way to evaluate how well an organization's activities support/comply with regulatory requirements, policies and procedures, goals/objectives, plans, etc. The following are examples of the use of self-assessment:

- The U.S. Customs and Border Protection agency uses self-assessment to improve voluntary compliance with federal trade regulations
- The American Public Works Association uses self-assessment to enhance performance, increase productivity, and strengthen employee morale
- The Baldrige National Quality Program, under the auspices of the National Institute of Standards and Technology, uses self-assessment to support performance excellence in business, education, and health care
- The Drucker Foundation uses self-assessment for nonprofit organizations to support management planning

Best Practices: Documented collective wisdom for successful accomplishment, gained from experience, benchmarking, and subject matter experts. The following are published examples of best practices:

- "Law Enforcement Tech Guide: How to plan, purchase, and manage technology (successfully)", Office of Community Oriented Policing Services
- "Best Practices of Compliant Companies", U.S. Customs and Border Protection
- "Current best practices: coping with major critical incidents.", the Federal Bureau of Investigation, September 2004

- “Domestic Violence: Best Practices for Law Enforcement Response”, North Carolina Governor’s Crime Commission, January 1998

The National Center for Women & Policing publication “Recruiting and Retaining Women: A Self-Assessment Guide for Law Enforcement” provides an example of the combination of self-assessment and best practices.

5. Observations and Discussion

To understand LEA management structure, policies and procedures, oversight methods, and extent of resident complaints, surveys were conducted by the Grand Jury using letters addressed to Orange County city managers and during interviews with other city leaders and participating LEAs. The following survey results indicate the total number of complaints made to LEAs for the years 2003-2005 and the percentage of the complaints that were sustained.

Orange County Complaint Source	Number of Complaints	Number Sustained	Percent Sustained
Resident complaints received by LEAs	1,317	162	12.3%
Internal complaints received by LEAs	1,378	736	53.4%

These numbers can be compared with resident complaints of other LEAs:

- Department of Justice 2000-2003 statistics indicate that 10.8% of 88,757 resident’s complaints statewide were sustained
- City of Los Angeles 2004-2005 statistics indicate that approximately 5% of 9,442 resident complaints were sustained

5.1 Current Monitoring Is Considered Adequate By Authorities

Survey results, public documents, and Grand Jury observations indicate that cities and LEAs in Orange County consider current oversight to be adequate for the following reasons:

- Policies and procedures evolve within LEA review processes and by association with organizations such as Orange County Chiefs’ of Police and Sheriff’s Association, the CALEA, and POST. In addition, LEAs have outreach programs to involve their respective communities, including advisory boards.
- Other oversight mechanisms exist such as the Orange County District Attorney, State Attorney General, Federal Department of Justice, the grand jury complaint system, Coroner’s reviews, and independent consultant reviews.
- All LEAs have internal as well as resident’s complaint procedures which provide for investigation and subsequent notification of the results to the complainant.
- Cooperation between LEAs, based upon protocols, was evident when a “call out” for an officer-involved shooting was witnessed by the Grand Jury.

Oversight of Orange County Law Enforcement Agencies

Representatives of the involved city agency, the District Attorney's Bureau of Investigation, and the OCSD worked together at the scene of the investigation.

- Cities with municipal police departments have a police chief appointed by the city manager/administrator who, in turn, is appointed by the city council. In general, oversight rests within this organization with the city council responsible to the residents of that city.
- The Orange County Sheriff-Coroner is elected by the citizens of the county and oversight is maintained within the OCSD; moreover, oversight is ultimately these same citizens through the election process.
- In many cases, complainants have unreal expectations that their complaint should be sustained and definitive action taken and communicated.

5.2 Why Monitoring May Not Be Adequate

Orange County and city LEAs have demonstrated themselves to be models of propriety by good governance and/or good fortune; few highly publicized and criticized police events have occurred. Although history may not demonstrate an overwhelming need, the following issues demonstrate that the best interests of Orange County residents could be served with increased public oversight:

- The election of the Sheriff-Coroner and the process of appointing police chiefs by elected city councils do not ensure that there is a proactive monitoring process at work. Examples of possible weaknesses include: public and city council interest/intervention limited; a lack of periodic reviews of LEA policies and procedures; public and council membership without law enforcement experience; the "chain of command" within LEAs: and, limited lines of communication between LEAs and the public.
- Orange County demographics are beginning to take on the look of surrounding counties where crime rates are significantly higher. Examples of crime-related trends within Orange County include:
 - The number of bookings in county-operated jails increased 10.4% between 2001 and 2005 to 66,330 while average daily inmate population increased 18.8%. At least one event of violence occurs daily during the booking process and approximately 10% of these events result in an injury.
 - District Attorney investigations of LEA officer-involved shootings, custodial deaths, and other officer-involved events increased from 18 in 2000 to 35 in 2005 after falling from a high of 59 in 1994.
- Although LEAs may continually work to improve policies and procedures, this does not ensure that these policies and procedures are evolving to a level of best

practices. One example of this is that Orange County law enforcement officers are certified to “minimum” standards and training may not be to a standard of best practices.

- A long time is required for a more culturally diverse work force to wend its way up the LEA management structure.
- The often publicized lack of visibility within LEAs seemingly exists because of the “closed ranks” defensive attitude between officers and between LEAs and the public.

5.3 Limitations of the Grand Jury Complaint System

The Criminal Justice committee of each grand jury is typically given the task of considering resident complaints against LEAs. The Grand Jury reviewed several resident complaints and found that there were significant limitations:

- A new grand jury is impaneled annually and requires several months for the members to develop the understanding and skills necessary to perform this specific responsibility
- The time to review complaints is negatively impacted as a result of:
 - the time required to act as “public watchdogs” by becoming familiar with county governance, determining issues that should be investigated, and completing reports
 - the 20%-30% of time required for criminal hearings
- Typically, there is limited law enforcement or legal experience on which to evaluate law enforcement practices and processes
- There may be a lack of continuity between successive grand juries
- Reporting to the complainant is via a non-specific letter and the grand jury cannot release decisions made to sustain or not sustain a complaint

5.4 Attributes of a Successful Citizen Oversight Mechanism

The Grand Jury determined that the following are key attributes of a successful oversight mechanism:

- Independence from political institutions and influence and from LEAs to ensure that a conflict of interest does not occur
- Use of best practice standards to measure: performance of officers, supervisors and management; effective policies and procedures; and, compliance to policy and procedures
- Provision for necessary resources for investigation and deliberation

- Representation of the county's demographics of age, diversity, gender, culture and socio-economic status
- Flexibility to meet the needs of a fast growing, dynamic community of residents and law enforcement

5.5 General Observations

Effectiveness of citizen oversight investigative mechanisms (citizen oversight boards) is debatable and Grand Jury review of several oversight mechanisms outside of Orange County proved disappointing. In most cases the individuals selected for investigative oversight were appointed by a political entity or work within a political entity, thus limiting their ability to act independently. An investigative oversight mechanism, in the absence of pressure or a defined necessity, appears too cumbersome and costly for adoption in Orange County at this time. One study indicated that investigative oversight may reduce the effectiveness of law enforcement by inhibiting peace officers doing their job.

Because internal investigations by LEAs support their actions in about 88% of resident complaints, an appearance of bias is created.

Although the review process by grand juries should continue, for a variety of reasons, the results are very limited.

Utilization of an outside consultant or special counsel to evaluate an LEA in its entirety would provide an in-depth review of operations, resulting in recommendations for improvement of policies and procedures. Such a review would also establish how well the LEA is managed and is evolving into a best practices organization. As an evaluative and performance-based oversight mechanism, this would meet the desirable goal of oversight to establish accountability and visibility of an LEA.

6. Findings

In accordance with California Penal Code §933 and §933.05, each finding will be responded to by the government entity to which it is addressed. The responses are to be submitted to the Presiding Judge of the Superior Court. The 2005-2006 Orange County Grand Jury has arrived at the following findings:

- 6.1** *Best practices goal:* Current practices for improving county and city law enforcement agencies' (LEAs') policies and procedures may not ensure that these policies and procedures are evolving to a level of best practices.
- 6.2** *Independent reviews of LEAs:* The use of independent reviews of LEAs' practices is limited to unique reviews rather than to periodic reviews of policies, procedures, and compliance.

- 6.3** *Orange County is changing:* Orange County and city LEAs will face new challenges as the number of crimes increase, reflecting those of surrounding counties.
- 6.4** *LEA self-assessment:* Using public/private sector management techniques such as best practices, self-assessment, and independent audits would improve LEA monitoring.
- 6.5** *Addressing resident complaints:* LEA and citizen oversight committees, including the grand jury face significant limitations when considering and responding to resident complaints about LEAs, including time constraints, inability to act independently, and lack of law enforcement and/or legal experience for citizen and grand jury committees.

Responses to Findings 6.1 through 6.4 are requested from the 21 Orange County municipal police departments and the Orange County Sheriff-Coroner.

Responses to Findings 6.2 and 6.3 are required from the 34 Orange County city mayors.

Responses to Finding 6.5 are required from the Orange County District Attorney and the Orange County Sheriff-Coroner.

7. Recommendations

In accordance with California Penal Code §933 and §933.05, each recommendation will be responded to by the government entity to which it is addressed. The responses are to be submitted to the Presiding Judge of the Superior Court. Based on the findings, the 2005-2006 Orange County Grand Jury makes the following recommendations:

- 7.1** *Best practices guidelines:* The Orange County municipal police departments should consider adopting or developing best practices guidelines appropriate for inclusion in LEAs' goals/objectives. An example would be the publication of a best practice document as a self-assessment guide to handling residents' complaints. (See Findings 6.1 and 6.4.)
- 7.2** *Near-term, independent review of LEA policies, procedures, and compliance:* The Orange County municipal police departments, in cooperation with the Orange County City Mayors, should consider contracting for a near-term independent review of LEAs' current policies, procedures, and compliance to provide current status as compared to best practices. (See Findings 6.2 and 6.3.)

- 7.3** *Periodic, independent reviews of LEA compliance to policies and procedures:* The Orange County municipal police departments, in cooperation with the Orange County City Mayors, should consider contracting for periodic, independent reviews of LEAs' policies and procedures, using best practices guidelines as criteria. (See Findings 6.2 and 6.3.)
- 7.4** *Strengthen grand jury:* The Orange County Sheriff's Department and the District Attorney should recommend specific training to each LEA and citizen oversight committee, including grand juries, directed toward review of resident complaints about LEAs. (See Finding 6.5.)

Responses to Recommendations 7.1 through 7.3 are requested from the 21 Orange County municipal police departments and required from the Orange County Sheriff-Coroner.

Responses to Recommendations 7.2 and 7.3 are required from the 34 Orange County city mayors.

Responses to Recommendation 7.4 are required from the Orange County District Attorney and the Orange County Sheriff-Coroner.

8. Acknowledgement

The Orange County Peace Officers' Memorial is "a tribute to all the officers who serve the County of Orange, and remembrance of those who have made the ultimate sacrifice." Fallen peace officers are commemorated at the memorial located at the Plaza of Flags, Civic Center, Santa Ana. Currently there are approximately 5,000 peace officers committed to serve and protect the residents of Orange County. Annually, many officers are commended for their actions and bravery in the face of adverse situations.



Memorial Ceremony, May 10, 2006

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